

**OFFICE OF THE STANDING CHAPTER 13 TRUSTEE**  
**6851 N.E. Loop 820, Suite 300**  
**North Richland Hills, TX 76180-6608**  
**(817) 770-8500**  
**Fax (817) 770-8511**

**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE NORTHERN DISTRICT OF TEXAS**  
**FORT WORTH DIVISION**

**IN RE:**

**RADESHA THURASINGHAM**

**Debtor,**

**Case No: 23-42519-ELM**

**Court Hearing:**  
**Time & Date: 8:30 AM on**  
**Thursday, December 7, 2023**

**TRUSTEE'S AMENDED OBJECTION TO CONFIRMATION**

**TO THE HONORABLE EDWARD L MORRIS, U.S. BANKRUPTCY JUDGE:**

Now comes Tim Truman, the Standing Chapter 13 Trustee, and files this his "Trustee's Amended Objection to Confirmation" of the Plan heretofore filed herein by Debtor, and for the same would respectfully show the Court as follows:

In addition to the grounds alleged in the previous objection, which are incorporated herein by reference, the Trustee objects to Confirmation of the Plan for the following reason(s):

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The Trustee would show that the Plan does not meet the requirements of the Bankruptcy Code and should not be confirmed for the following reasons:

The Trustee is unable to determine whether or not to recommend confirmation of the plan until the following is provided. These were requested verbally at the adjourned 341 meeting on 11/15/2023, and by email to the Debtor the same day:

1. . File within ten (10) days a written Objection to Claim for Claim # 2-1 for \$18,933.09 filed by Oak Creek Owners Association, Inc., unless you chose to pay it as filed under your Chapter 13 Plan.
2. If you do not intend to file an Objection to the Oak Creek Claim but rather pay it as filed under your Chapter 13 Plan, within ten(10) days file an Amended Plan to provide for its full payment.
3. If you file an Objection to the Oak Creek claim, immediately get a setting (time and date for hearing of the Objection) from the Court's Clerk that is at least 30 days after you file the Objection, and immediately file with the Court a Notice of Hearing . Serve a copy of the Objection and Notice on the attorney for Oak Creek.
4. Amend Schedule I to remove any inaccurate payroll deductions.
5. Amend Schedule A/B to show any "claim" you have against anyone, including Oak Creek.
6. Amend Schedule A/B to show any IRA you own.
7. Amend Schedule I/J to show any income (withdrawal) you make monthly from your IRA.
8. Amend Schedule I/J to show any food stamp income/benefit.
9. Within ten (10) days file an Adversary Proceeding to collect any money you claim is owed to you.
10. Within ten (10) days, provide me with a redacted copy of your latest filed federal income tax return (I will send you separate instructions on how to do that through 13docs.com)
11. Within ten (10) days, provide me with copy of your current driver's license. (through 13docs)
12. Within ten (10) days, provide me with a copy of your social security card (through 13docs.)
13. Within ten days (10) days, provide me with proof that you have paid in full the \$167.20 claim by Tarrant County, or get them to Withdraw their claim #1-1.
14. Within ten (10) days provide me with a copy of your latest statement on your IRA account (through 13docs).

**WHEREFORE, PREMISES CONSIDERED**, the Trustee prays that said Plan not be confirmed unless and until it has been modified to cure all objections set forth hereinabove, and for general relief.

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Respectfully submitted,

By: /s/ Tim Truman

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Tim Truman, Bar # 20258000  
Standing Chapter 13 Trustee  
Angela Allen, Bar # 007869700  
Staff Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing "Trustee's Objection to Confirmation" was served on all parties listed below in the manner listed below on or before November 17, 2023.

/s/ Tim Truman

\_\_\_\_\_  
Tim Truman, Angela Allen

**BY FIRST CLASS MAIL:**

RADESHA THURASINGHAM, 1712 BAIRD FARM CIR #2213, ARLINGTON, TX 76006-0000

**BY ELECTRONIC SERVICE:**

LINEBARGER GOGGAN BLAIR & SAMPSON LLP, 2777 N STEMMONS FWY #1000, DALLAS, TX 75207

CAGLE PUGH, 4301 WESTBANK DR BLDG A STE 150, AUSTIN, TX 78746

United States Trustee, 1100 COMMERCE STREET, ROOM 976, DALLAS, TX 75242